

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

THE DIAMOND CONSORTIUM, INC.  
D/B/A THE DIAMOND DOCTOR

*Plaintiffs,*

VS.

MARK HAMMERVOLD and  
HAMMERVOLD PLC.

*Defendants.*

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Civil Action No. 4:17-CV-00452

**OPPOSED MOTION FOR LEAVE TO FILE DECLARATION OF MARK  
HAMMERVOLD UNDER SEAL**

In accordance with Eastern District of Texas Local Rule CV-5(a)(7), Defendants Mark Hammervold and Hammervold PLC (“Hammervold”) file this opposed Motion for Leave to File the Declaration of Mark Hammervold, an attachment to counsel’s motion to withdraw, under seal.

Because the Declaration of Mark Hammervold contains personal financial information, Defendants seek to have the declaration, and only the declaration, filed under seal. All other attachments to the motion to withdraw will not be filed under seal.

Counsel for Hammervold provided the Hammervold Declaration to Defendants on an Attorneys' Eyes Only basis in the hopes of obtaining their agreement to this motion. Despite having done so, and despite having their own financial information filed under seal in related litigation, Counsel for Plaintiffs oppose this motion because, in their opinion, it is not the proper subject of a motion to seal. Counsel for Plaintiffs provided no additional explanation.

Dated: August 8, 2018

Respectfully submitted,

/s/ Varant Yegparian

Varant Yegparian

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**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Howard Klatsky on August 7 and August 8. During that time, I provided Mr. Klatsky with the Hammervold Declaration on an Attorneys' Eyes Only basis. Mr. Klatsky stated that the motion is opposed because, in Plaintiffs' opinion, the Hammervold Declaration's content is not "the proper subject of a motion to seal."

/s/ Varant Yegparian  
Varant Yegparian

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 8, 2018, a true and correct copy of the foregoing filing was served upon all counsel of record via the Court's ECF system.

/s/ Varant Yegparian  
Varant Yegparian